

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

EZRA SMITH,

Plaintiff,
v.

DEPUTY MONIQUE TRACEY, *et al.*,

Defendants.

Civil Action No.: 1:24-cv-05158-TWT

JOINT MOTION TO EXTEND DISCOVERY DEADLINES

COME NOW, the parties jointly, and file this Joint Motion requesting an extension of the discovery deadlines in this case, showing the Court as follows:

1. Plaintiff filed this action on November 12, 2024.
2. Defendants Tracy, Jackson, and Gomez filed waivers of service on December 27, 2024, and their answers on February 21, 2025. Doc. 3-5; 16-17.
3. Defendant Sanchez was not served until January 29, 2025. Doc. 10. In lieu of filing an answer, Defendant Sanchez filed a motion to dismiss, which this Court recently denied. Doc. 47. Her answer is still forthcoming.
4. During the pendency of Defendant Sanchez's motion, the parties have exchanged written discovery requests. The parties have not yet begun depositions.
5. Discovery is now set to expire on July 21, 2025. LR26.2(a), NDGa.
6. The parties have diligently pursued written discovery, but the parties agree

that additional time would benefit the orderly completion of depositions.

7. The parties request that this court extend discovery by ninety days to permit the parties time to take the necessary party and witness depositions before filing dispositive motions.

WHEREFORE, the parties respectfully move this Court to extend the close of discovery until Thursday, October 19, 2025.

Consented to on July 2, 2025.

<p>SPEARS & FILIPOVITS, LLC Attorneys for Plaintiff</p> <p><u>Jeff Filipovits</u> Jeff Filipovits Georgia Bar No. 825553</p> <p><u>Wingo Smith</u> Wingo Smith Georgia Bar No. 147896</p> <p>315 W. Ponce de Leon Ave., Ste. 865 Decatur, GA 30030 (404) 905-2225 jeff@civil-rights.law wingo@civil-rights.law</p>	<p>SLATER LEGAL PLLC Attorneys for Plaintiff</p> <p><u>James M. Slater</u> James M. Slater Georgia Bar No. 169869</p> <p>2296 Henderson Mill Rd NE #116 Atlanta, Georgia 30345 (404) 458-7283 james@slater.legal</p>
<p>BUCKLEY CHRISTOPHER & HENSEL, P.C. Attorneys for Defendants Gomez and Jackson</p> <p><u>Timothy J. Buckley III</u> Timothy J. Buckley III Georgia Bar No. 092913</p>	<p>WILLIAMS & WAYMIRE, LLC Attorneys for Defendant Tracey</p> <p><u>Jason C. Waymire</u> JASON C. WAYMIRE Georgia Bar No. 742602</p> <p>Building 400, Suite A 4330 South Lee Street, NE</p>

<p><u>Eric J. O'Brien</u> Eric J. O'Brien Georgia Bar No. 383754 2970 Clairmont Road, NE Suite 650 Atlanta, Georgia 30329 (404) 633-9230 tbuckley@bchlawpc.com eobrien@bchlawpc.com</p>	<p>Buford, Georgia 30518 (678) 541-0790 (678) 541-0789 jason@wmwlaw.com</p>
	<p>HUFF, POWELL & BAILEY, LLC Attorneys for Defendant Sanchez <u>Antonio E. Veal</u> Antonio E. Veal Georgia Bar No. 460007 999 Peachtree Street, Suite 950 Atlanta, Georgia 30309 (404) 892-4022 aveal@huffpowellbailey.com</p>